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CIV. NO. 03-12324-D-P-W

CR. NO. 96-10032 DPW

NOW COME'S THE PETITIONER (BRADSHAW'S)
PRO-SE MOTION REQUESTING THAT THE GOVERNMENT
STIPULATE THAT THE FOLLOWING RECORDS BE
RETAINED IN THE DISTRICT COURT DESIGNATED
PART OF THE RECORD SUBJECT TO BE CALLED
BY THE COURT OF APPEALS OR BY REQUEST
BY ANY PARTY, PURSUANT TO FED. R. App PROC.
11 (F).

(i) THE DOCKET ENTRIES IN CR. NO. 96-10032, WHICH ALSO SHOULD BE SENT CERTIFIED TO THE APPEALS COURT.

(2) TRIAL COUNSEL'S OPENING STATEMENT
D.E. 487 4-4-00.

- (3) TIM BOGART'S TESTIMONY, D.E. 487
4-4-00
- (4) MIKE STANLEY'S TESTIMONY D.E. 487
4-6-00
- (5) RONALD DESIMONE'S TESTIMONY D.E. 487
4-6-00, AND D.E. 489 4-7-00.
- (6) DONALD DESIMONE'S TESTIMONY D.E. 489
4-7-00. CROSS OF DONALD D.E. 489, 4-10-00
- (7) CHRISTINA BELLEFEUILLE'S TESTIMONY D.E.
489 4-11-00
- (8) JAMES WERRA'S TESTIMONY, D.E. 495
4-12-00
- (9) ROGER HUNT'S TESTIMONY, D.E. 495, 4-12-00,
AND D.E. 504, 4-13-00
- (10) A COPY OF THE GOVERNMENT'S MOTION TO
PRECLUDE DEFENSE WITNESSES RE: STATEMENTS
AGAINST INTEREST, D.E. 565, 4-17-00
- (11) AFTER GOV'T REST'S, COPY OF TRANSCRIPTS OF
EX-PARTE HEARING WITH TRIAL COUNSEL, D.E.
504, 4-18-00.
- (12) AGENT NORRIS TESTIMONY, D.E. 504, 4-18-05
- (13) CLOSING ARGUMENTS.
- (14) SUTHERLAND AND COURTEAU'S GUILTY PLEAS.
- (15) A COPY OF THE SUPERCEEDING INDICTMENT
COUNTS 7 THROUGH 9 D.E. 7-28-98.
- (16) UNSEAL THE DEFENDANT'S PRO-SE EX-PARTE IN-
CAMERA MOTION FOR A SEALED PROFFER HEARING
OF SCAPICCHIO REQUESTING HER USE IMMUNITY

AT TRIAL AND ALL ATTORNEY RELATED EXCULPATORY INVESTIGATION REPORTS, LIKELY FILED ON OR ABOUT 3-30-00 OR 3-31-00... OR CERTIFY TO THE 1ST CIRCUIT, THE ENCLOSED MOTION IS THE SAME FILED.

(17) HAVE AVAILABLE THE GOVERNMENT'S OCTOBER 22, 1997 SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO DISQUALIFY ~~Scapicchio~~ COUNSEL FOR DEFENDANT SUTHERLAND, OR CERTIFY TO THE 1ST CIRCUIT THE ENCLOSED MOTION IS THE SAME FILED.

(18) MAINTAIN A COPY OF THE DISTRICT COURT'S TRANSCRIPT DENYING THE SCAPICCHIO USE IMMUNITY MOTION UNDER SEAL, AND UNSEAL THE SAME.

(19) MAINTAIN A COPY OF MIKE STRUIK'S JUNE/JULY 1995 302, BY TUNA RICHARDS AND CONFIRM SAID DOCUMENT WAS NOT TURNED OVER UNTIL THE RELEASE OF TRUCKS IN AUGUST 1999. OR CERTIFY TO THE FIRST CIRCUIT THE ENCLOSED 302, IS THE SAME.

(20) MAINTAIN A COPY OF WILLIAM NINITCH'S ~~JUNE~~ JUNE 20, 1997 DEBRIEFING, AND CERTIFY A COPY TO THE 1ST CIRCUIT.

(21) MAINTAIN A COPY OF SCAPICCHIO'S SEPTEMBER 19, 2003 AFFIDAVIT, FILED IN SUPPORT OF A

REQUEST FOR AN EVIDENTIARY HEARING, IN THE 2255.

(22) MAINTAIN A COPY OF JAMES WERRA'S SEPTEMBER 1995 INITIAL INFORMATION CONVEYED TO THE GOVERNMENT THAT BRADSHAW WAS STAYING AT LALLY'S AND THE CONTRABAND WAS HIS...

(23) MAINTAIN A COPY OF JAMES WERRA'S GRANDJURY TESTIMONY.

(24) MAINTAIN A COPY OF DONALD DESIMONE'S GRANDJURY TESTIMONY.

(25) MAINTAIN A COPY OF CHRISTINA BELLEFEUILLE'S DEBRIEFING STATING SHE DROVE THE SWITCH CAR AND KEVIN LALLY AND BRADSHAW STUCK UP ROXIES IN W. ROXBURY MA.

(26) MAINTAIN A COPY OF JOSEPH BRADSHAW'S VERIFIED MOTION TO COMPEL ASSIGNED COUNSEL TO FILE A MOTION TO DISMISS INDICTMENT BASED ON ALMOST 3 YR PREJUDICIAL DELAY AND/OR THE APPROPRIATE RELIEF D.E. 250, 11-10-98.

(27) MAINTAIN A COPY MOTION BY BRADSHAW TO DISMISS ANDREWS D.E. 253, 6-22-98.

(28) MAINTAIN A COPY ANDREWS MOTION TO WITHDRAW D.E. 254, 6-25-98.

(29) MAINTAIN COPIES OF MOTIONS TO COMPEL ASSIGNED COUNSEL TO FILE, 244, 245, 246, 247, 248, 249, 251, AND 252.

- (30) MAINTAIN A COPY OF MOTION BY JOSEPH BRADSHAW TO DISMISS, D.E. 263, 12-4-98.
- (31) MAINTAIN A COPY OF THE 6-21-96 TRANSCRIPTS D.E. 6-21-96.
- (32) MAINTAIN A COPY OF THE 12-2-97 TRANSCRIPTS 12-2-97.
- (33) MAINTAIN A COPY OF JUDGE WOLF'S 12-5-97 ORDER D.E. 209.
- (34) MAINTAIN A COPY OF JUDGE WOLF'S 4-2-98 ORDER D.E. 218.
- (35) MAINTAIN A COPY OF JUDGE WOLF'S 1-13-99 AND 1-14-99 ORDERS D.E. 271.
- (36) MAINTAIN A COPY OF BRADSHAW'S SPEEDY TRIAL MOTION/MEMORANDUM OF LAW WITH A AFFIDAVIT IN SUPPORT D.E. 357 AND 358 9-3-99
- (37) MAINTAIN A COPY OF THE GOVERNMENT'S MEMORANDUM IN OPPOSITION TO 357-1 MOTION TO DISMISS PURSUANT TO S.T.A.

DATED 12-12-05

Respectfully Submitted

Joseph Bradshaw
20980-038

U.S.P. MAX - A-D-X
Box 8500

FLORENCE CO. 81226

CERTIFICATE OF SERVICE

I, JOSEPH BRADSHAW, DO HEREBY CERTIFY
THAT I HAVE CAUSED A TRUE COPY OF
THE FOREGOING TO BE SERVED BY 1ST
CLASS MAIL POSTAGE PREPAID ON A.U.S.A.
DINA M. CHAITOWITZ, ONE COURTHOUSE WAY
SUITE 9200 BOSTON MA. 02210

DATED 12-12-05.

Joseph Bradshaw